

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re the matter of

DEBRA C. HILL,

Debtor.

NO. 19-14264
CHAPTER 7

JUDGE A. BENJAMIN GOLDGAR

NOTICE OF MOTION

TO:

Debra C. Hill
362 Oglesby Ave.
Calumet City, IL 60409
BY U.S. MAIL

Jonathan R. Haddad, Attorney for Debtor
N. Neville Reid, Chapter 7 Trustee

**BY ELECTRONIC TRANSMISSION
BY ELECTRONIC TRANSMISSION**

PLEASE TAKE NOTICE that on June 10, 2019 at 9:30 a.m., or as soon thereafter as Counsel may be heard, we shall appear before the Honorable A. BENJAMIN GOLDGAR, Bankruptcy Judge, at **219 South Dearborn Street, Courtroom #642, Chicago, Illinois**, and then and there present the attached Motion to Modify the Automatic Stay, a copy of which is hereby served upon you.

PROOF OF SERVICE

I, the undersigned attorney, certify that I served a copy of this Notice with Motion to Modify the Automatic Stay, attached, upon the parties listed above, by the methods specified, from 2056 Ridge Road, Homewood, Illinois 60430 before the hour of 5:00 P.M. on the 30th day of May, 2019.

BY: /s/ Terri M. Long
TERRI M. LONG

LAW OFFICES OF TERRI M. LONG
2056 Ridge Road
Homewood, Illinois 60430
Phone: (708) 922-3301
Fax: : (708) 922-3302

Atty. for SPECIALIZED LOAN SERVICING LLC, SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF13, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-FF13, its Successors and/or Assigns

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MOTION TO MODIFY AUTOMATIC STAY

Now comes SPECIALIZED LOAN SERVICING LLC, SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF13, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-FF13, its successors and/or assigns, (hereinafter referred to as “Movant”) a creditor herein, by TERRI M. LONG, its attorney, and moves this Honorable Court for entry of an Order modifying the restraining provisions of §362 of the Bankruptcy Code, and in support thereof respectfully represents as follows:

1. On May 17, 2019, the Debtor herein filed a petition for relief under Chapter 7 of the Bankruptcy Code.

2. Movant is a creditor of the Debtor with respect to a certain mortgage upon real estate, with a common address of 362 Oglesby, Calumet City, Illinois 60409, with a total debt of \$167,695.00 as of May 29, 2019.

3. The Debtor has not offered, and Movant is not receiving, adequate protection for its secured interest or depreciating value.

4. The Debtor has *no* equity in the aforesaid real estate, and the said collateral is not necessary to an effective reorganization by the Debtor.

5. Movant will suffer irreparable injury, harm and damage should it be delayed in foreclosing its security interest therein.

6. According to the Debtor's Statement of Intention, the Debtor intends to surrender this property to creditor.

7. SPECIALIZED LOAN SERVICING LLC services the loan on the Property referenced in this motion. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant or Movant's successor or assignee. Movant, directly or through an agent, has possession of the Note. The Note is either made payable to Movant or has been duly endorsed. Movant is the original mortgagee or beneficiary or the assignee of the Mortgage/Deed of Trust.

8. Movant requests that Bankruptcy Rule 4001(a)(3) not apply to any Order granting this motion.

WHEREFORE, SPECIALIZED LOAN SERVICING, LLC, SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF13, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-FF13, its successors and/or assigns, prays that this Honorable Court enter an Order modifying the restraining provisions of §362 of the Bankruptcy Code to permit the said Movant to foreclose its security interest in certain real estate, with a common address of 362 Oglesby, Calumet City, Illinois 60409, and for such other and further relief as this Court may deem just.

SPECIALIZED LOAN SERVICING, LLC,
SERVICER FOR DEUTSCHE BANK
NATIONAL TRUST COMPANY, AS
TRUSTEE FOR FIRST FRANKLIN
MORTGAGE LOAN TRUST 2006-FF13,
MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF13, its
Successors and/or Assigns

BY: /s/ Terri M. Long
TERRI M. LONG

Terri M. Long

LAW OFFICES OF TERRI M. LONG

2056 Ridge Road

Homewood, Illinois 60430

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Atty. for SPECIALIZED LOAN SERVICING, LLC, SERVICER FOR DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF13, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-FF13, its Successors and/or Assigns